

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

ZURICH AMERICAN)
INSURANCE COMPANY,)
)
Plaintiff,)
)
v.)
)
PATRIOT MODULAR, LLC and)
ELDECO PIPE AND FABRICATION,)
LLC,)
)
Defendants.)
_____)

Case No.: 1:22-cv-04377-JPB

MOTION FOR SERVICE BY PUBLICATION

COMES NOW Zurich American Insurance Company (“Zurich”), Plaintiff herein, and, pursuant to Fed. R. Civ. P. 4(h)(1)(a) and (e)(1), files its motion to serve Defendant Patriot Modular, LLC by publication.

Cypress relies upon its Memorandum In Support of Motion for Service by Publication, and attached exhibits in support of its motion.

[Signature on the following page]

Respectfully submitted this 3rd day of March, 2023.

/s/ Kenan G. Loomis

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*Attorneys for Plaintiff Zurich
American Insurance Company*

CERTIFICATION: The above-signed counsel hereby certifies that this document was prepared in Times New Roman 14-point font with a 1.5 inch top margin in accordance with LR 5.1B, N.D. Ga.

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PATRIOT MODULAR, LLC and
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LLC,

Defendants.

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CERTIFICATE OF SERVICE

I hereby certify that on the 3rd day of March, 2023, I electronically filed the foregoing **MOTION FOR SERVICE BY PUBLICATION AS TO DEFENDANT PATRIOT MODULAR, LLC** with the Clerk of the Court using the CM/ECF system. I further hereby certify that I have also served a copy of the foregoing via U.S. Mail on Defendants Eldeco and Patriot as follows:

Eldeco Pipe and Fabrication, LLC
c/o Allen McKinney
5751 Augusta Road
Greenville, SC 29605

Patriot Modular, LLC
c/o Justin Kreft
120 Bearle Street
Pasadena, TX 77506

This 3rd day of March, 2023.

/s/ *Kenan Loomis*

Kenan G. Loomis